

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Christine Chen, Michael Nguyen, and all other
similarly situated employees of SS&C,

Plaintiffs,

v.

SS&C TECHNOLOGIES, INC.,

Defendant.

Civil No.: 22-cv-02190 (JPC) (SLC)

**DECLARATION OF CORNELIA VIEIRA CONCERNING: (A) MAILING OF CAFA
NOTICE; (B) MAILING OF THE NOTICE; AND (C) REPORT ON REQUESTS FOR
EXCLUSION AND OBJECTIONS**

I, Cornelia Vieira, declare as follows:

1. I am a Project Manager at Strategic Claims Services (“SCS”), a nationally recognized class action administration firm. I have over seven years of experience specializing in the administration of class action cases. SCS was established in April 1999 and has administered over five hundred and fifty (550) class action cases since its inception. I have personal knowledge of the facts set forth herein.

2. Pursuant to the Settlement Stipulation¹ approved by the Court’s Order Granting Plaintiffs’ Unopposed Motion for Preliminary Approval of the Proposed Settlement Stipulation, Certifying the Class for Settlement Purposes, Approving the Proposed Notice and Authorizing Distribution of the Notice Package, and Implementing the Settlement Procedure, dated June 17, 2024 (Dkt. No. 121, the “Preliminary Approval Order”), SCS was retained as the Claims Administrator to provide notification to the Class Members, administer the processing of claims,

¹ All capitalized terms used herein that are not otherwise defined have the meanings ascribed to them in the Settlement Stipulation, dated May 30, 2024 (Dkt. No. 120-1, the “Settlement Stipulation”).

and perform the services described in the Stipulation of Settlement, as well as any other services mutually agreed by the Parties in connection with the Settlement of the above-captioned action. I submit this declaration in order to provide the Court and the Parties with information regarding the notifications to potential Class Members, as well as other aspects of the Settlement administration process.

MAILING OF CAFA NOTICE

3. Following the Settlement Stipulation and at the request of Attorneys for the Defendant, on June 6, 2024, SCS mailed a notice of proposed class action settlement, pursuant to the Class Action Fairness Act of 2005, 28 U.S.C. § 1715 (“CAFA”), to the appropriate federal and state officials, by certified return receipt through the United States Postal Service. The mailing consisted of: (a) a letter regarding the Settlement approved by Defendant’s Counsel describing the mailing (the “CAFA Letter”); and (b) a CD-ROM containing copies of the documents referenced in the CAFA Letter. Attached as **Exhibit A** is a copy of the CAFA Letter that SCS mailed.

4. Following the execution of the Amendment to the Settlement Stipulation (the “Amendment”) and at the request of Attorneys for the Defendant, on July 15, 2024, SCS mailed a supplemental notice of proposed class action settlement, pursuant CAFA, to the appropriate federal and state officials, by certified return receipt through the United States Postal Service. The mailing consisted of: (a) a letter regarding the Amendment approved by Defendant’s Counsel describing the mailing (the “Supplemental CAFA Letter”); and (b) a CD-ROM containing copies of the Amendment and accompanying letter to the Court, which were filed with the Court on July 2, 2024. Attached as **Exhibit B** is a copy of the Supplemental CAFA Letter that SCS mailed.

DISSEMINATION OF MAILED NOTICE

5. Pursuant to the Preliminary Approval Order, on June 24, 2024, SCS received from Defense Counsel the class data for individuals who worked or currently work for SS&C as Associates, Senior Associates, or equivalent titles in New York, and were classified as exempt from overtime compensation at any time between February 5, 2016 and the present. The class data contained the names, Social Security numbers, and contact information for 756 Class Members, as well as allocation data to be used for calculating each Class Member's potential share of the settlement.

6. Pursuant to the Preliminary Approval Order, on July 1, 2024, SCS mailed, by first-class mail, a Notice Package to the 756 Class Members identified in the class data. Prior to mailing, the class data was run through the United States Postal Service national change of address service to obtain new address information. A copy of the Notice Package is attached hereto as **Exhibit C**.

7. Out of the 756 Notice Packages mailed, 74 were returned as undeliverable. Those 74 Notice Packages returned as undeliverable were "skip-traced" to obtain updated addresses and 60 were re-mailed to updated addresses.

8. After the dissemination of the Notice Packages, SCS was contacted by five individuals whose names were not contained in the class data and who inquired about their potential inclusion in the class. As directed by counsel for the Parties, SCS e-mailed a Notice Package to the additional five individuals, and upon determination by counsel for the Parties, four of those individuals were subsequently added to the class list.

REPORT ON EXCLUSIONS, OBJECTIONS AND CLAIM FORMS

9. The Notice Package informed Class Members that written requests for exclusion must be mailed so that they were postmarked or otherwise received by SCS no later than August 30, 2024. SCS has been monitoring all mail delivered for this case. As of the date of this declaration, SCS has received two requests for exclusion. Copies of the two requests are attached hereto as **Exhibit D**.

10. According to the Notice Package, Class Members seeking to object to the Settlement must have mailed those objections to SCS so that they were postmarked or otherwise returned no later than August 30, 2024. As of the date of this declaration, SCS has not received any objections.

11. The Notice Package informed Class Members that the optional Claim Forms must be mailed so that they were postmarked or otherwise received by SCS no later than August 30, 2024. As of the date of this declaration, SCS has received 222 Claim Forms, seven of which are duplicates, and three of which were rejected as directed by counsel for the Parties.

UPDATED ALLOCATION DATA

12. On September 27, 2024, SCS received updated allocation data from Defense Counsel to be used for calculating each Class Member's share of the settlement in the event SCS is directed to proceed with distribution of the settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 10th day of October 2024, in Media, Pennsylvania.



Cornelia Vieira